

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF MINNESOTA**

In re:

ERP IRON ORE, LLC,

Debtor.

Chapter 11

Case No.: 18-50378 (WJF)

NOTICE OF APPEARANCE AND REQUEST FOR SERVICE OF DOCUMENTS

The undersigned hereby gives notice pursuant to Fed. R. Bankr. P. 9010(b) that Matthew W. Silverman, Esq. is appearing in the above-captioned bankruptcy case on behalf of Wilmington Savings Fund Society, FSB as Indenture Trustee for the Floating Rate Senior Secured Amortizing PIK Toggle Notes due 2019.

Pursuant to Fed. R. Bankr. P. 2002(g), all notices and all other papers served or filed in this case, including pleadings, motions, applications, orders, financial and other papers should be served upon:

Matthew W. Silverman, Esq.
Pryor Cashman LLP
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New York, NY 10036-6569
Telephone: (212) 326-0824
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This request for notice is intended, without limitation, to constitute such request for service as is required by Bankruptcy Rules 2002 and 3017, and a request for court designated service as set forth in Bankruptcy Rules 3019, 3020(b)(1), 4001(a)(1), 6006(c), 9007, 9013 and 9019 and to receive CM/ECF notification in the case.

Neither this Notice of Appearance nor any subsequent appearance, pleading, claim or suit is intended to waive (i) any party's right to have final orders in non-core matters entered only after *de novo* review by a district court judge; (ii) any party's right to trial by jury in any proceeding triable herein, or in any case, controversy or proceeding related hereto; (iii) any party's right to have the reference withdrawn by the District Court in any matter subject to mandatory or discretionary withdrawal; or (iv) any other rights, claims, actions, defenses, setoffs, or recoupments to which any party is or may be entitled under agreements, in law or in equity, all of which rights, claims, actions, defenses, setoffs and recoupments are expressly reserved.

The foregoing simply constitutes demand and request for notice and does not constitute consent to the jurisdiction of the Bankruptcy Court or a waiver of the right to trial by jury.

Dated: August 1, 2018

PRYOR CASHMAN LLP

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**ATTORNEYS FOR WILMINGTON
SAVINGS FUND SOCIETY, FSB AS
INDENTURE TRUSTEE**